

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

RYAN, LLC,

Plaintiff,

v.

FEDERAL TRADE COMMISSION,

Defendant.

Case No. 3:24-cv-986-E

**PLAINTIFF-INTERVENORS' OPPOSED MOTION FOR STAY OF
EFFECTIVE DATE AND PRELIMINARY INJUNCTION**

Pursuant to Federal Rule of Civil Procedure 65, the Chamber of Commerce of the United States of America, Business Roundtable, Texas Association of Business, and Longview Chamber of Commerce (Plaintiff-Intervenors) respectfully move for a stay of effective date and preliminary injunction under the Administrative Procedure Act. *See* 5 U.S.C. § 705. Plaintiff-Intervenors' contentions of fact and law and arguments and authorities in support of a stay and preliminary injunction are set forth in Plaintiff-Intervenors' Brief In Support of Motion For Stay of Effective Date and Preliminary Injunction.

Dated: May 10, 2024

Respectfully submitted,

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CERTIFICATE OF WORD COUNT

This Motion for Stay of Effective Date and Preliminary Injunction complies with the Procedures for Cases Assigned to District Judge Ada Brown and Standing Order, Rule II(A), because it contains 87 words.

/s/Robert L. Sayles

Robert L. Sayles

CERTIFICATE OF CONFERENCE

Pursuant to Local Rule 7.1(b), I hereby certify that on May 10, 2024 counsel for Plaintiff-Intervenors conferred with Andrew Kilberg and other counsel for plaintiff regarding Plaintiff-Intervenors' intention to file this motion. Plaintiff's counsel stated that Plaintiff is unopposed to the relief requested herein. I further certify that on May 10, 2024 I conferred with Rachael L. Westmoreland and other counsel for Defendant regarding Plaintiff-Intervenors' intention to file this motion. Defendant's counsel stated that Defendant is opposed to this motion and the relief requested herein.

/s/ Judson O. Littleton

Judson O. Littleton

Counsel for Movants

CERTIFICATE OF SERVICE

I hereby certify that on May 10, 2024, I electronically transmitted the attached document to the Clerk of the Court and all counsel of record using the ECF System for filing and service in accordance with Local Rule 5.1.

/s/ Robert L. Sayles
Robert L. Sayles